

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

United States of America,

Case No. 22-CR-224 (NEB/TNL)

Plaintiff,

vs.

DEFENDANT QAMAR AHMED
HASSAN'S UNOPPOSED MOTION
TO ALLOW TRAVEL

Qamar Ahmed Hassan, et al.,

Defendants.

Defendant Qamar Ahmed Hassan, by and through counsel, respectfully moves the Court for an order granting permission for her to travel to Seattle, Washington to attend a family wedding. Liban Farah and Ikran Ahmed are the couple to be married, and Ms. Hassan is related to the bride, Ms. Ahmed. Ms. Hassan will travel by plane to Seattle with her sister Shamso Hassan and daughter Filsan Hassan. Ms. Hassan and her family intend to leave on Thursday, September 21, 2023 and return to Minnesota on Sunday, September 24, 2023. Ms. Hassan's flight is scheduled to land at MSP at 11:57 p.m., so Ms. Hassan will arrive in Minnesota on Sunday, September 24, absent a flight delay. They will stay at the Sheraton Grand Seattle at 1400 6th Avenue, Seattle, Washington, 98101.

Defense counsel has conferred with Assistant U.S. Attorney Harry Jacobs regarding this request, and he has no objection. Ms. Hassan contacted Probation who told her it had no position on her request and that she would need to file this Motion. Ms. Hassan agrees to maintain contact with her counsel and to return to Minnesota by September 24, 2023 absent a flight delay.

Dated: September 19, 2023

Respectfully submitted,

DORSEY & WHITNEY LLP

By s/ Beth Forsythe

Beth Forsythe (#0386688)

forsythe.beth@dorsey.com

50 South Sixth Street, Suite 1500

Minneapolis, MN 55402

Telephone: (612) 340-2600

Facsimile: (612) 340-2868